
Lahontan Regional Water Quality Control Board

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Lynda Deschambault
United States Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
Deschambault.Lynda@epa.gov

**Comments Regarding Atlantic Richfield Company's Final
Baseline Human Health Risk Assessment Work Plan Revision 2 –
Task Sampling and Analysis Plan for Bioaccessibility Testing,
Leviathan Mine Site, Alpine County, California**

Thank you for the opportunity to comment on Atlantic Richfield Company's April 21, 2017 *Final Baseline Human Health Risk Assessment Work Plan Revision 2 – Task Sampling and Analysis Plan for Bioaccessibility Testing*, for the Leviathan Mine Site. California Regional Water Quality Control Board, Lahontan Region (Water Board) staff has the following comments:

1. Page 5, Section 5.0 first paragraph – From the information provided, Water Board staff understands the sample locations for bioaccessibility testing will be selected to represent the range in arsenic concentrations detected in samples from other investigations. The document should specify both the numeric range of arsenic concentrations detected in samples from other investigations, as well as the range of arsenic concentrations to be evaluated under this Work Plan. Also, Water Board staff understands that arsenic will be used as an indicator chemical for other metals potentially related to mine waste. The document should explain the basis for the decision to use arsenic as an indicator for other metals related to mine waste.
2. Table 3, Field Sampling Plan Summary for Bioaccessibility Testing – From Table 3, Water Board staff understands the locations for Leviathan Mine Road Reference samples and Leviathan Mine Road samples will be along transects across Leviathan Mine Road, with road reference samples coming from “cut material” and road samples coming from “fill material.” Has it been verified that there is a cut into native materials on each transect? For purposes of clarity, Water Board staff recommends specifying that the road reference sample is to be collected from that portion of the transect that constitutes an excavated cut slope into native ground, and the road sample is to be collected from that portion of the transect that constitutes the travel way for vehicular traffic (not

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

2501 Lake Tahoe Blvd., So. Lake Tahoe, CA 96150 | 15095 Amargosa Road, Bldg 2, Ste 210, Victorville CA 92394
e-mail Lahontan@waterboards.ca.gov | website www.waterboards.ca.gov/lahontan



including shoulders). With a sample depth of 6 inches below ground surface, it is unlikely that the road sample will penetrate beyond roadway surface treatment and into fill materials so specifying the sample is to be collected from fill material is somewhat confusing. There are only nine sample locations for the Leviathan Mine Road, however the work plan states that ten samples from each media will be evaluated, please clarify.

If you have any questions regarding these comments, please contact Hannah Schembri, Water Resource Control Engineer, at hannah.schembri@waterboards.ca.gov or (530) 542-5423, or me at douglas.carey@waterboards.ca.gov or (530) 542-5468.

A handwritten signature in dark ink, reading "Douglas Carey". The signature is written in a cursive, flowing style.

Douglas Carey, P.G.
Senior Engineering Geologist, Leviathan Mine